



UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

NO. CR14-5539BHS

Plaintiff,

GOVERNMENT'S MOTION FOR
DETENTION

v.

DARRYL LEE WRIGHT,

Defendant.

The United States moves for detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because this case involves:

- Crime of violence (18 U.S.C. § 3156)
- Crime of Terrorism (18 U.S.C. § 2332b(g)(5)(B)) with a maximum sentence of ten years or more
- Crime with a maximum sentence of life imprisonment or death
- Drug offense with a maximum sentence of ten years or more
- Felony offense and defendant has two prior convictions in the four categories above, or two State convictions that would otherwise fall within these four categories if federal jurisdiction had existed

1 Felony offense involving a minor victim other than a crime of violence
2 Felony offense, other than a crime of violence, involving possession or use
3 of a firearm, destructive device (as those terms are defined in 18 U.S.C. § 921), or any
4 other dangerous weapon
5 Felony offense other than a crime of violence that involves a failure to
6 register as a Sex Offender (18 U.S.C. § 2250)
7 Serious risk the defendant will flee
8 Serious risk of obstruction of justice, including intimidation of a
9 prospective witness or juror

10 2. Reason for Detention. The Court should detain defendant because there are
11 no conditions of release which will reasonably assure (check one or both):

12 Defendant's appearance as required
13 Safety of any other person and the community
14 3. Rebuttable Presumption. The United States will invoke the rebuttable
15 presumption against defendant under § 3142(e). The presumption applies because:

16 Probable cause to believe defendant committed offense within five years of
17 release following conviction for a "qualifying offense" committed while on
18 pretrial release
19 Probable cause to believe defendant committed drug offense with a
20 maximum sentence of ten years or more
21 Probable cause to believe defendant committed a violation of one of the
22 following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or
23 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism)
24 Probable cause to believe defendant committed an offense involving a
25 victim under the age of 18 under 18 U.S.C. §§ 1591, 2241, 2242,
26 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3),
27 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425
28

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

At the initial appearance

After continuance of 3 days (not more than 3)

DATED this 29th day of January, 2015.

Respectfully submitted,

ANNETTE L. HAYES
Acting United States Attorney

DAVID REESE JENNINGS
Assistant United States Attorney